
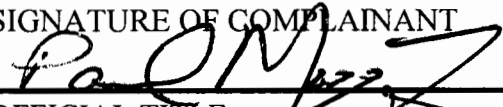



United States District Court	DISTRICT of ARIZONA
United States of America v. Sonya Romero; DOB: 1970; U.S. Citizen Patrick Coleman; DOB: 1990; U.S. Citizen	DOCKET NO. MAR 5 2009 MAGISTRATE'S CASE NO. 09-04658M CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA DEPUTY
Complaint for violations of Title 21, United States Code § 846 Title 18, United States Code § 924(c)(1)(A)(ii)	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: <u>COUNT 1</u> Beginning at a time unknown, and continuing to on or about March 4, 2009, at or near Tucson, in the District of Arizona, Sonya Romero and Patrick Coleman , did knowingly and intentionally combine, conspire, confederate and agree with other persons to possess with intent to distribute 100 kilograms or more but less than 1,000 kilograms of marijuana, that is, approximately 163.5 kilograms of marijuana, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii). All in violation of Title 21, United States Code, Section 846. (Continued on reverse)	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On March 4, 2009, Tucson District Office Drug Enforcement Administration agents established surveillance in the Wal Mart parking lot located at 1650 W. Valencia Rd., Tucson, AZ . This location is a documented and known narcotics stash and drop location. During the course of their surveillance, agents observed Sonya ROMERO standing near a tan colored Ford Expedition walking around and speaking on her cell phone. Agents then observed a maroon minivan arrive in the parking lot and pull up next to the tan Expedition. ROMERO approached the driver of the minivan and appeared to engage the driver in conversation. At this time agents observed two Hispanic males, identified as a juvenile male and Patrick COLEMAN exit the tan Expedition and approach the minivan. As the juvenile male and COLEMAN approached the minivan, both individuals pointed weapons at the driver and the passenger of the minivan. The juvenile male was armed with a shotgun and COLEMAN was armed with a handgun. The juvenile male and COLEMAN forced the occupants of the mini-van out of the vehicle at gunpoint. COLEMAN then entered the driver's side of the maroon minivan and departed the parking lot. (Continued on reverse)	
MATERIAL WITNESSES IN RELATION TO THE CHARGE:	
REQUEST DETENTION Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. Kleiner/kc AUTHORIZED BY: AUSA 	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Special Agent, Drug Enforcement Administration
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE 	DATE March 5, 2009

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54

COUNT 2

On or about March 4, 2009, at or near Tucson, in the District of Arizona, **Sonya Romero and Patrick Coleman**, did use, carry and brandish firearms, that is, a Mossberg 12 gauge shotgun, bearing serial number T047359, a Mossberg sawed-off 12 gauge shotgun, bearing serial number L85473, and a Ceska .32 caliber handgun, bearing serial number 701667, during and in relation to a drug trafficking crime, that is, Conspiracy to Possess with Intent to Distribute Marijuana, as alleged in Count One of this complaint, a felony which may be prosecuted in a court of the United States, and did use, carry and brandish such firearms in furtherance of such crime; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

Probable Cause statement continued from front:

Also during this time, Sonya ROMERO and the juvenile male re-entered the tan Expedition and departed the parking lot; Sonya ROMERO was driving the tan Expedition. Agents followed the vehicles and attempted to conduct vehicle stops on both vehicles. Neither ROMERO nor COLEMAN complied as both vehicles fled from agents. Agents observed COLEMAN drive erratically on the wrong side of the road and force other vehicles off the road. Agents eventually observed as the maroon minivan crashed into a wash. As agents approached the minivan, COLEMAN attempted to flee from agents on foot. After a short foot pursuit agents apprehended COLEMAN. Inside the van, agents recovered fifteen bundles of marijuana weighing approximately 163.5 kilograms (359 pounds), as well as a loaded shotgun and a loaded pistol. Each weapon was loaded to capacity with a round chambered. During this same time frame, agents were following ROMERO who was driving the tan Expedition, and fleeing from agents. An agent observed the juvenile male in the backseat of the vehicle holding a shotgun and pointing it in the direction of the agent giving pursuit. Eventually, Sonya ROMERO crashed the vehicle. ROMERO, the juvenile male, and a juvenile female exited the vehicle and attempted to flee from agents on foot. Agents, assisted by Deputies from the Pima County Sheriff's Office, apprehended Sonya ROMERO, the juvenile female and the juvenile male. A loaded shotgun was also discovered at the crash site. During a post arrest interview, Sonya ROMERO admitted to driving the tan Expedition which fled from agents.